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July 21, 2017

E-FILING

Clerk

United States District Court

District of New Jersey – Trenton

Clarkson S. Fisher Federal Building & U.S. Courthouse
402 E. State Street
Trenton, NJ 08

RE: UNITED STATES OF AMERICA v. JUSTIN LOVE, et al
CRIM. NO.: cr-17-00051

Dear Sir/Madam:

Attached is defendant, Justin Love's Motion to Modify Conditions of Release, with supporting Certification of Counsel, and proposed Order, which is being e-filed on the above date with the Court, the U.S. Attorney's Office and all relevant counsel.

Thank you for your attention.

Very truly yours,

Wayne Powell /s/

BY: _____

WAYNE POWELL

WP/mv

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Attorney(s) for defendant, Justin Love

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY – TRENTON

UNITED STATES OF AMERICA :

Plaintiff : **CRIMINAL NO.: 17-00051**

v.

:

JUSTIN LOVE, et al

:

Defendant

:

MOTION TO MODIFY CONDITIONS OF RELEASE

COMES NOW, the defendant, Justin Love by and through his undersigned counsel and moves for the entry of an order modifying his conditions of release.

RELIEF REQUESTED

It is respectfully requested that the court grant this motion and modify Justin Love's conditions of release as follows.

1. Vacate the Court's prior order for home detention and electronic monitoring.

WHEREFORE, defendant, Justin Love respectfully requests that the Court grant this motion and permit the Court's previous order setting the conditions of release be modified to vacate the condition of home detention and electronic monitoring.

Respectfully submitted,

Wayne Powell /s/

Wayne Powell, Esquire
Wayne Powell Attorney, P.C.
Attorney(s) for defendant, Justin Love

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Attorney(s) for defendant, Justin Love

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY – TRENTON**

UNITED STATES OF AMERICA	:	
Plaintiff	:	CRIMINAL NO.: 17-00051
v. .	:	
JUSTIN LOVE, et al	:	CERTIFICATION OF COUNSEL
	:	IN SUPPORT OF NOTICE OF
Defendant	:	MOTION TO MODIFY CONDITIONS
	:	DEFENDANT’S RELEASE /B AIL

Wayne Powell, of full age hereby certifies the following.

- 1) I am an attorney at law in the state of New Jersey representing the defendant herein and I am fully familiar with the facts of this matter.
- 2) On or about June 1, 2016 Defendant was arrested by elements of the U.S. Marshal’s Service for violations of the Federal Criminal Code.
- 3) On June 2, 2016 Defendant appeared before the Federal District Court for the District of New Jersey in Newark.

4) Defendant was released on home arrest by the Magistrate Judge as a result of the Court's finding that the conditions of release recommended by Pre-trial Services was sufficient to assure the Defendant's presence for future proceedings.

5) Subsequent thereto Defendant's conditions of release were modified by consent to allow the Defendant to change his place of residence on two occasions and to lift restrictions to Defendant's ability to work, and ultimately the character of his home detention to a curfew.

6) Since the advent of the above changes Defendant has become self-employed in a new medical transportation business which requires the Defendant to transport patients and to fill in for employees where there are call-outs or other absenteeism.

7) Defendant now moves for an order of this court further amending the Defendant's conditions of release to rescind the conditions of home confinement, to vacate the Defendant's bail condition of home confinement and permit the Defendant to remain at liberty pursuant to an unsecured bond.

8) Defendant has been on pre-trial release for over one (10 year without any infractions or violations and Defendant does not present any significant flight risk given Defendant's potential exposure for the offense charged

9) For the reasons set forth above it is respect fully submitted that the Defendant's motion to modify bail conditions be granted.

Respectfully submitted,

Wayne Powell /s/

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Attorney(s) for defendant, Justin Love

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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY – TRENTON**

UNITED STATES OF AMERICA :

Plaintiff : **CRIMINAL NO.: 17-00051**

v. :

JUSTIN LOVE, et al :

Defendant :

ORDER

AND NOW, this _____, day of _____, 2017, upon the application of Wayne Powell, counsel for defendant, Justin Love, and the Court having considered the Defendant's Motion to Modify the Conditions of Defendant's Release, any oral argument of counsel and for other good cause being shown;

IT IS ORDERED that the Conditions of Release for defendant, Justin Love be Modified as follows: _____.

BY THE COURT:

J.